

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

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|----------------------------------|---|----------------|
| HENRY WATKINS, | : | |
| | : | NO. 02-CV-2881 |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| PENNSYLVANIA BOARD OF | : | |
| PROBATION & PAROLE, | : | |
| EDWARD JONES, and MICHAEL BUKATA | : | |
| | : | |
| Defendants. | : | |
| | : | |

**DEFENDANTS' MOTION FOR A CONTINUANCE
OF THE TRIAL DATE AND TO COMPEL DISCOVERY**

Defendants, the Pennsylvania Board of Probation and Parole (the "Board"), Willie E. Jones (improperly pled as Edward Jones) ("Mr. Jones"), and Michael Bukata ("Mr. Bukata") (collectively the "Defendants") by their attorneys, respectfully submit this Motion for a Continuance of the Trial Date, and, in support thereof, states as follows:

1. On August 18, 2006, Defendants filed a Motion for a continuance of the trial date of September 5, 2006, and to compel discovery.
2. On August 22, 2006, the Court entered an Order granting Defendants' Motion and setting November 6, 2006 as a date certain for trial.
3. Defendant Michael Bukata has pre-paid vacation plans from November 10, 2006 through November 20, 2006.

4. Counsel for Defendants failed to inform the Court of Mr. Bukata's plans. Counsel apologizes to the Court, the parties and Plaintiff's counsel for his error.
5. It is expected that the trial in this matter will last for more than four days.

WHEREFORE, for the foregoing reasons Defendants respectfully request that this Court grant their Motion for a Continuance of the Trial Date.

Respectfully submitted,

MILLER, ALFANO & RASPANTI, P.C.

By: s/Lisa R. Marone

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Attorneys for Defendants,
Pennsylvania Board of Probation
and Parole, Willie E. Jones,
and Michael Bukata

Dated: August 25, 2006

CERTIFICATE OF SERVICE

I, Lisa R. Marone, hereby certify that a true and correct copy of Defendants' Motion for a Continuance of the Trial Date was served upon the following person and in the manner listed below:

VIA FIRST CLASS U.S. MAIL

Robert J. Sugarman, Esquire
Sugarman & Associates
11th Floor, Robert Morris Building
100 North 17th Street
Philadelphia, PA 19103

BY: s/Lisa R. Marone
LISA R. MARONE

Dated: August 25, 2006